

1 BUCHALTER, A Professional Corporation  
2 VALERIE BANTNER PEO (SBN: 260430)  
3 55 Second Street, Suite 1700  
4 San Francisco, CA 94105-3493  
5 Telephone: (415) 227-0900  
6 Fax: (415) 227-0770  
7 Email: vbantnerpeo@buchalter.com

8 Attorneys for Creditor  
9 JPMORGAN CHASE BANK N.A.

10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**OAKLAND DIVISION**

In re  
JADOOTV, INC.  
Debtor.

Bankruptcy Case No. 19-41283 (WJL)

Chapter 11

R.S. No. BN-001

**JOINT STATEMENT REGARDING  
MOTION TO APPROVE  
STIPULATION FOR RELIEF FROM  
STAY**

Date: September 9, 2020  
Time: 10:30 a.m.  
Ctrm: TELEPHONIC  
Room 220  
1300 Clay Street  
Oakland, CA 94612

Creditor JPMorgan Chase Bank, N.A. (“**JPMC**”) and debtor JadooTV, Inc. (“**Debtor**”), through their undersigned counsel, submit the following *Joint Statement Regarding Motion to Approve Stipulation for Relief From Stay* (“**Joint Statement**”).

On August 11, 2020, JPMC and Debtor, through their respective counsel, entered into the *Stipulation for Relief from the Automatic Stay*. Also on August 11, 2020, JPMC filed the *Motion to Approve Stipulation for Relief from the Automatic Stay* [Dkt. No. 298] (the “**Motion**”). A hearing on the Motion is scheduled for September 9, 2020 at 10:30 a.m.; any opposition was due

1 by August 26, 2020. *See Notice of Motion to Approve Stipulation for Relief from the Automatic*  
2 *Stay* [Dkt. No. 299].

3 On August 26, 2020, the U.S. Small Business Administration (“SBA”) filed the *U.S.*  
4 *Small Business Administration’s Statement of Non-Opposition to Motion to Approve Stipulation*  
5 *for Relief From the Automatic Stay* [Dkt. No. 304]. As of the date of this Joint Statement, no other  
6 response has been filed to the Motion. JPMC and the Debtor have not received any informal  
7 opposition to the Motion.

8 In response to comments from the SBA, JPMC made one clarifying change to the  
9 proposed order approving the Motion, which change has been approved by counsel to the Debtors  
10 and is reflected in the redlined proposed order attached hereto as **Exhibit A**.

11  
12 DATED: September 1, 2020

BUCHALTER  
A Professional Corporation

13  
14  
15 By: /s/ Valerie Bantner Peo  
VALERIE BANTNER PEO  
Attorneys for Creditor  
JPMorgan Chase Bank, N.A.

16  
17  
18 DATED: September 1, 2020

KELLER BENVENUTTI KIM LLP

19  
20 By: /s/ Jane Kim  
JANE KIM  
Attorneys for Debtor  
JadooTV, Inc.

# EXHIBIT A

1 BUCHALTER, A Professional Corporation  
2 VALERIE BANTNER PEO (SBN: 260430)  
3 55 Second Street, Suite 1700  
4 San Francisco, CA 94105-3493  
Telephone: (415) 227-0900  
Fax: (415) 227-0770  
Email: vbantnerpeo@buchalter.com

5 Attorneys for Creditor  
6 JPMORGAN CHASE BANK N.A.

7  
8 UNITED STATES BANKRUPTCY COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 OAKLAND DIVISION

11 In re  
12 JADOOTV, INC.  
13 Debtor.

Bankruptcy Case No. 19-41283 (WJL)  
Chapter 11  
R.S. No. BN-001

14  
15 ORDER LIFTING THE AUTOMATIC  
16 STAY AND GRANTING RELATED  
RELIEF

17 Date: September 9, 2020  
18 Time: 10:30 a.m.  
19 Ctrm: TELEPHONIC  
Room 220  
1300 Clay Street  
Oakland, CA 94612

20  
21  
22 A hearing was held at the above-captioned date and time on the *Motion to Approve*  
23 *Stipulation for Relief from the Automatic Stay* (“**Motion**”) filed by JPMorgan Chase Bank, N.A.  
24 (“**JPMC**”) and the *Stipulation For Relief From The Automatic Stay* (“**Stipulation**”) between  
25 JPMC and JadooTV, Inc. (“**Debtor**”), attached as Exhibit 1 to the Motion. Appearances were  
26 stated on the record.

27 The Court, having considered the Motion, finds that the Court has jurisdiction over the  
28 parties and the subject matter, and further finds that notice was appropriate under the

1 circumstances, and other good cause appearing, hereby

2 ORDERS, as follows:

3 1. The Motion is granted;

4 2. The Stipulation is approved;

5 3. The PPP Motion is denied as moot;

6 4. Relief from the automatic stay under 11 U.S.C. § 362(a) is granted to allow JPMC  
7 to exercise all of its rights and remedies under the Account Agreement,<sup>1</sup> the PPP Note and  
8 applicable law, including the right of offset, to the extent of the Default Amount;

9 5. The fourteen day stay of prescribed under Rule 4001(a)(3) of the Federal Rules of  
10 Bankruptcy Procedure is waived; and

11 6. This Order shall ~~be~~remain binding and effective upon any conversion of this case  
12 to another chapter under the Bankruptcy Code.

13 \*\* END OF ORDER \*\*

14  
15 APPROVED AS TO FORM:

16 DATED: September 1~~August 11~~, 2020

KELLER BENVENUTTI KIM, LLP

17  
18 By: /s/ Jane Kim

JANE KIM

19 Attorneys for Debtor JadooTV, Inc.  
20  
21  
22  
23  
24  
25  
26  
27

28 <sup>1</sup> Capitalized terms used herein shall have the meanings ascribed to them by the Stipulation.